

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

EQUASHIA MUMEEN,

PLAINTIFF

VS.

NO. _____

LSI STAFFING, INC., and

PATTERSON DISTRIBUTION COMPANY, INC.,

DEFENDANTS

**COMPLAINT FOR DAMAGES PURSUANT TO
VIOLATIONS OF THE CIVIL RIGHTS ACT OF 1964
(42 USC 2000 e)**

Comes now the Plaintiff, Equashia Mumeen, by and through her counsel of record, Javier Michael Bailey, Esquire, pursuant to The Civil Rights Act of 1964, 42 USC 2000e, wherein this action arises from discrimination and disparate treatment in the workplace. In furtherance of this action the Plaintiff would show this honorable court the following:

PARTIES

1. The Plaintiff is a resident of Memphis, Tennessee. At all relevant times pleaded herein, the Plaintiff worked for LSI Staffing and Patterson Distribution Company in Memphis, Tennessee. The Plaintiff is a devout Muslim, African American Female.

2. LSI Staffing is believed to be a Tennessee Corporation. At all relevant times pleaded herein, the Defendant LSI Staffing operated an office within the jurisdictional boundaries of the Western District of Tennessee.
3. Patterson Distribution Company is believed to be a Tennessee Corporation. At all relevant time pleaded herein, Defendant Patterson Distribution operated a warehouse within the jurisdictional boundaries of the Western District of Tennessee.

JURISDICTION

4. This case arises from alleged violations of 42 USC 2000e, wherein the Plaintiff alleges that both defendants discriminated against her and subjected her to disparate treatment in the workplace as a result of her religion and race. Accordingly, there is a federal question and jurisdiction is properly vested with this honorable court.

FACTS PRESENTED

5. On or about June 1, 2009, the Plaintiff was employed by LSI Staff in Memphis, Tennessee. She was assigned by contract to work at Patterson Distribution Company as a warehouse clerk. The Plaintiff was qualified for her employment and carried out her duties well.
6. The Plaintiff was approached by the supervisory staff at Patterson Distribution and LSI Staffing about her religious headdress. The Plaintiff is a devout Muslim and her faith requires that she maintain a covering on her head at all times. This is a standard tenant of her faith and in no way interfered with her ability to carry out the functional requirements of her employment.
7. The Plaintiff show the Defendants, by and through their agents and assigns, the Quoranic scriptures requiring her to maintain modest dress and to be covered at all times. However

the Defendants insisted that she remove her covering or be removed from further employment.

8. The white males on this particular job site often wore caps, and so did some of the non-Muslim women. However the Plaintiff was told to remove her headdress because “it might offend some of the workers.” Accordingly the Plaintiff was terminated.

CAUSES OF ACTION

9. The Civil Rights Act found at 42 USC 2000e prohibits discrimination in the workplace on the basis of religion or race. The termination of the Plaintiff because she exercised her religious practices, without interfering with her job performance, is a clear violation of the Civil Rights of the Plaintiff as set forth therein.
10. The conduct of the Defendants by and through their assigns and agents was disparate to the Plaintiff and caused her loss of employment. Said loss of employment resulted in economic damages to the Plaintiff.
11. The Plaintiff exhausted all of her administrative remedies.

WHEREFORE PREMISES CONSIDERED, the Plaintiff prays:

1. That the court find that the Defendants have violated the civil rights of the Plaintiff and that said violation resulted in damages to the Plaintiff .
2. That the court award the Plaintiff compensatory damages in the amount of \$500,000.
3. That the court award any other such relief as this honorable court deems appropriate.

Respectfully submitted,

/s/ Javier Bailey

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